



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

March 12, 2015

VIA ELECTRONIC MAIL

Mr. Jay Stewart
Environmental Manager
BAE Systems, Ordnance Systems, Inc.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford, Virginia 24141

**Re: Radford Army Ammunition Plant, Radford, VA
EPA ID No. VA1210020730, Extension Request for Renewal Application for
Reissuance of Facility's Open Burning Grounds Permit**

Dear Mr. Stewart:

The DEQ received your request for a 120 day extension for the Radford Army Ammunition Plant's (RAAP) submission of the renewal application for the Open Burning Grounds (OBG) Permit, dated March 2, 2015, via electronic mail on March 9, 2015. As detailed in your request letter, the extension is being requested to allow for additional time to complete the OBG renewal permit application. The extension request is in addition to the already approved 60 day extension, which revised the application submittal to a deadline of June 29, 2015, which was granted in a letter transmitted via electronic mail on February 4, 2015 in order to address issues raised in the Notice of Deficiency for the Energetic Waste Incinerator permit application that are applicable to the OBG as well. While RAAP has requested a 120 day extension for the application deadline, to extend the application submittal deadline to October 28, 2015, the DEQ has determined that an extension of this length is not warranted at this time based on the justification provided.

As a result the current deadline for RAAP's submission of the OBG renewal permit application will remain June 29, 2015. However, as specified in the previous 60 day extension approval letter, dated February 4, 2015, RAAP may submit an additional extension request with proper justification for review by DEQ prior to the expiration of the current deadline.

Additionally your extension request letter detailed that RAAP had not received contact information for another RCRA OB/OD permitted facility which has since ceased their OB/OD operations from DEQ yet. The contact information was transmitted twice via electronic mail on September 29, 2014, included in the second listed item, and again on December 18, 2014. A copy of these email transmittals has been attached to this letter for your reference. If you have any questions regarding this letter please contact me at (804) 698-4467 or by e-mail at Ashby.Scott@deq.virginia.gov.

Sincerely,



Mr. Ashby Scott
Title V Coordinator

Office of Waste Permitting and Compliance

Attachments:

Archived Electronic Mail Transmittal to Mr. Jay Stewart dated, September 29, 2014

Archived Electronic Mail Transmittal to Mr. Rob Davie dated, December 18, 2014

cc: Central Hazardous Waste Files
Andrea Barbieri, EPA, Region III (3LC50)
Aziz Farahmand, DEQ, Blue Ridge Regional Office
Leslie Romanchik, Russ McAvoy, Jutta Schneider, Kurt Kochan, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant

Archived: Monday, March 09, 2015 3:50:16 PM

From: Scott, Ashby (DEQ)

Sent: Monday, September 29, 2014 2:06:00 PM

To: 'Stewart, Jay (US SSA)'

Cc: 'McKenna, Jim'; McAvoy, Russell (DEQ); Farahmand, Aziz (DEQ); Schneider, Jutta (DEQ); Kochan, Kurt (DEQ); 'michele.gehring@coterie-env.com'; 'Mike Lawless (mlawless@daa.com)'; 'Janet Frazier (jfrazier@daa.com)'; 'barbieri.andrea@epa.gov'; 'Alberts, Matt (US SSA)'; Romanchik, Leslie (DEQ); Iyer, Sonal (DEQ); Williams, Justin (DEQ)

Subject: Radford Army Ammunition Plant (VA1210020730) OB/OD Permit Call-in - September 25th Conference Call

Importance: Normal

Attachments: Section_O.doc; Section_N.doc; Section_M.doc; Section_J_K_L.doc; Section_I.doc; Section_H.doc; Section_G.doc; Section_F.doc; Section_E.doc; Section_D.doc; Section_C.doc; Checklist.docx; Subpart_X_Miscellaneous_Units.pdf; Section_A_B.doc; Aurell EFs from Aerial and Ground es402101k.pdf; Aurell Military Waste online ver es303131k.pdf; Aurell, Gullett, et al Chemosphere 85, 806-811, 2011.pdf;

Mr. Stewart,

As a follow up to our conference call on September 25th regarding the RCRA permit for the open burning grounds at your facility the following information is included to answer the questions that were brought up during the call.

1. The permitting checklists have been attached to this email for your reference. One checklist is a generalized version for RCRA facilities, the second checklist is specific to Subpart X miscellaneous units.
2. The contact information for the facility which intends to close an open burning/open detonation ground and ship their energetic wastes off-site to be treated is Mr. Tim Holden, Environmental Safety Manager, Aerojet – Virginia Operations, Phone #: 540-854-2037, Email : tim.holden@aerojet.com. Please contact Mr. Holden with any questions you have regarding off-site treatment of their waste stream and any analysis which was done regarding on-site versus off-site treatment.
3. The contact information for the EPA monitoring program for OB/OD sites is Mr. Brian K. Gullett, Ph.D, US EPA Office of Research and Development National Risk Management Research Laboratory, Phone: 919-541-1534, Email: gullett.brian@epa.gov. Please contact Mr. Gullett for information about the OB/OD monitoring program and how RAAP may participate. Attached are copies of the

research papers Mr. Gullett has published on the subject matter.

4. I have spoken with our air modeling group at DEQ regarding the models currently in use for OB/OD units. Previously the Open Burn-Open Detonation Model (ODODM) was used in the risk assessment of the open burning grounds. This model and the science behind it have not substantially changed since the previous risk assessment and the OBODM should be used in the current risk assessment. The modeling group did suggest that if your facility participates in the EPA study to monitor emissions from the open burning ground to use those emission factors developed from the monitoring as the input for the OBODM. For the previous risk assessment the modeling used monitored emissions from a bang box for small caliber ammunition. As these are not quite comparable to the open burning grounds it is highly suggested the emissions be directly monitored and these values be input into the model to ensure the most accurate results.

Please let me know if you have any additional questions. I can be reached using the contact information in my signature line and I maintain regular office hours Monday through Friday.

Thanks,

Ashby

Ashby R. Scott
Title V Coordinator

Department of Environmental Quality

629 East Main Street

Richmond, VA 23218
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Archived: Thursday, March 12, 2015 10:48:45 AM

From: [Davie, Robert N III CIV \(US\)](#)

Sent: Thursday, December 18, 2014 12:40:22 PM

To: [Scott, Ashby \(DEQ\)](#)

Cc: [Romanchik, Leslie \(DEQ\)](#); [Williams, Justin \(DEQ\)](#); [Regn, Ann \(DEQ\)](#); [Jennings, Ross B CIV \(US\)](#); [Saks, Charles E Jr CIV USARMY JMC \(US\)](#); [Diioia, Leonard L Jr CIV \(US\)](#)

Subject: RE: Contact Information for Aerojet

Importance: Normal

Digitally Signed: Yes

Ashby,

It was good to meet you as well and thanks for the info. I'll pass it along to the right folks so they can make contact.

Enjoy your holidays!

Rob

-----Original Message-----

From: Scott, Ashby (DEQ) [<mailto:Ashby.Scott@deg.virginia.gov>]

Sent: Thursday, December 11, 2014 2:49 PM

To: Davie, Robert N III CIV (US)

Cc: Romanchik, Leslie (DEQ); Williams, Justin (DEQ); Regn, Ann (DEQ)

Subject: Contact Information for Aerojet

Rob,

It was good to meet you during our site visit, below is the contact information for the environmental manager at the Aerojet facility which has started shipping their previously open burned hazardous waste offsite to be treated:

Tim Holden

Environmental and Safety Manager

Aerojet - Virginia Operations

540-854-2037

tim.holden@aerojet.com

Please let me know if you need any additional information.

Thanks,

Ashby

Ashby R. Scott
Title V Coordinator

Department of Environmental Quality

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